

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

TONYA CHAMBERS,

Plaintiff,

v.

AEROCARE HOLDINGS, INC.,

Defendant.

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CIVIL ACTION NO. 4:19-CV-00987-Y

(Relates to Motion Referred to Magistrate
Judge Cureton)

**SUPPLEMENTAL APPENDIX IN SUPPORT
MOTION TO COMPEL DISCOVERY**

COMES NOW, Plaintiff Tonya Chambers (“Plaintiff”) and files this, her Appendix in Support of Plaintiff’s Motion to Compel Discovery.

<u>Description</u>		<u>Appendix Page</u>
Exhibit A	February 21, 2020 Affidavit of James R. Langley	App. 001
Exhibit B	February 18, 2020 Affidavit of Trinity Drury	App. 002-003

DATED: October 9, 2020

Respectfully Submitted,

/s/ Jennifer J. Spencer

Jennifer J. Spencer

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ATTORNEYS FOR PLAINTIFF

TONYA CHAMBERS

CERTIFICATE OF SERVICE

I hereby certify that, on **October 9, 2020**, a true and correct copy of the foregoing document was served on all counsel of record via the Court's ECF system.

/s/ James E. Hunnicutt

James E. Hunnicutt

(No Subject)

From: JR Langley (jrlangley77@gmail.com)

To: tonyapchambers@yahoo.com

Date: Friday, February 21, 2020, 04:29 PM CST

To whom it may concern,

My name is James R. Langley and I was one of the original six founding members for AeroCare which was incorporated in November of 2000. I opened the Fort Worth, Texas location and hired the first employees. I went on to be the Regional Manager for North Texas, the Texas Panhandle and Oklahoma. Tonya was hired in 2002 and shortly thereafter we started to grow and began opening locations in the Metroplex and across North Texas. The employees from the Fort Worth office were vital in helping me train the new employees. Out of that group we formed a training team, and Tonya was one of those employees we used as a trainer under my direct supervision through out her employment with the company. We also cross trained key employees in order to fill other positions in the office. This allowed us to seamlessly cover those positions on the occasion when people were off for vacation or absent due to illness. As the company grew and our systems became more complex Tonya continued to be a key employee we used for training and coverage. She regularly attended corporate training meetings, passed annual competency evaluations and performed competency evaluations and ride along evaluations on employees in other locations each time the company went through Accreditation Surveys. Over the thirteen or fourteen years Tonya worked under my supervision her work quality, performance and dedication to the Company exceeded expectations and she was looked up to as a role model by the other employees. Her dedication and performance was recognized by our President and CEO at Annual and National meetings on several occasions. She was trained to step into any role in the office at a moment's notice and was regularly called on to do just that. Any location in my region would have jumped at the possibility of adding Tonya to their team. The fact that a well trained employee who had been with the company as many years as Tonya had could be pushed out of AeroCare instead of being transitioned to any number of positions she was trained for is beyond my understanding or comprehension and certainly goes against the company culture and philosophy that guided us when we set out to build a better company than anything that had been done in Homecare before, a company that I was so proud to have been a part of for so many years. I would like for someone to explain how there was not a position available that could have benefited from her vast understanding of our company's history, skill set and knowledge in Granbury or one of the surrounding locations? It's not acceptable to treat employees like this, particularly employees who constantly gave as much as Tonya did.

Sincerely,
James R. Langley
817.992.1142
4612 Francis Ct.
Granbury, TX 76049
Former Shareholder
Regional Manager
AeroCare Holdings, Inc.
2000-2016

Sent from my iPhone

EXHIBIT A

APP. 001

CHAMBERS 000095

Trinity Drury
Registered Respiratory Therapist
601 Bruce Road
Godley, Texas 76044
(817) 219-0326
Trinitydrury79@gmail.com

February 18, 2020

Jackson Spencer Law pllc
Three Forest Plaza
12221 Merit Drive, Suite 160
Dallas, Texas 75251

Dear Sir or Madam,

I am writing regarding my work history with Tonya Chambers. I started working with Tonya at the Aerocare Fort Worth location on September 10th, 2003, as a service technician. A few years later, we moved to a newly opened location in Granbury, Texas, with our regional manager J.R. Langley. I left Aerocare on May 9th, 2011, to further pursue my career in healthcare by attending college full-time.

During our time at the Granbury location, we were cross-trained as customer service representatives (CSR) given that our site was small, at the time, we only had one full-time CSR, whom we would have to fill in for occasionally. Throughout the many years I worked with Tonya, we were both sent to other locations (Amarillo, Round Rock, and Waco) in J.R.s region for extended periods to help "shape up" the office if they were to get behind. We implemented many systems to assist the business run smoothly, answered phones, set appointments, and completed the paperwork necessary for Medicare and most major insurances. When the opportunity for a customer service representative became open, Tonya was the first choice, given that she had seniority. However, at the time, she did not want to change positions, so I became the new CSR for the Granbury location. During that time, Tonya helped me immensely by keeping up with the new referrals as well as renewals that were required every year through Medicare. If I was absent, she was there to cover my shift, knowing she was more than capable of completing daily tasks.

I worked with Tonya for eight and a half years at Aerocare. We never had any work-related issues, she worked well as a team member, and she was a fantastic patient advocate. The

EXHIBIT B

APP. 002

CHAMBERS 000092

patients always came first, and she would make sure they were completely taken care of not only physically but financially; by working with doctors' offices and insurances alike to get their vital equipment paid with minimal out-of-pocket expenses.

Sincerely,

Trinity Drury, RRT

Trinity Drury, RRT